

1 NICOLAS A. JAMPOL (State Bar No. 244867)  
2 nicolasjampol@dwt.com

2 SAMUEL A. TURNER (State Bar No. 338089)  
3 samturner@dwt.com

3 DAVIS WRIGHT TREMAINE LLP  
4 865 South Figueroa Street, 24th Floor  
5 Los Angeles, California 90017-2566  
6 Telephone: (213) 633-6800  
7 Fax: (213) 633-6899

8 AMANDA LEVINE (*pro hac vice* forthcoming)  
9 amandalevine@dwt.com

10 DAVIS WRIGHT TREMAINE LLP  
11 1251 Avenue of the Americas, 21st Floor  
12 New York, New York 10020  
13 Telephone: (212) 489-8230  
14 Fax: (212) 489-8340

15 Attorneys for Defendants  
16 AMAZON STUDIOS LLC, AMAZON  
17 CONTENT SERVICES LLC, PATRICK  
18 MCKAY, JOHN D. PAYNE, JEFF BEZOS,  
19 AND JENNIFER SALKE

20  
21  
22  
23  
24  
25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

DEMETRIOS POLYCHRON, an  
individual

Plaintiff,

vs.

JEFF BEZOS, an individual, JENNIFER  
SALKE, an individual, SIMON  
TOLKIEN, an individual, PATRICK  
MCKAY, an individual, JOHN D.  
PAYNE, an individual, AMAZON  
STUDIOS LLC, a California Limited  
Liability Company, AMAZON  
CONTENT SERVICES LLC, a Delaware  
Limited Liability Company, THE  
TOLKIEN ESTATE, THE TOLKIEN  
ESTATE LIMITED, THE TOLKIEN  
TRUST, and DOES 1-100

Defendants.

Case No. 2:23-cv-02831-SVW-E

**JOINT STIPULATION TO EXTEND  
TIME TO RESPOND TO INITIAL  
COMPLAINT BY NOT MORE  
THAN 30 DAYS (L.R. 8-3)**

Complaint served: May 4, 2023  
Current response date: July 3, 2023  
New response date: July 24, 2023

1 Pursuant to L.R. 8-3, this stipulation is entered by and between plaintiff  
2 Demetrious Polychron (“Plaintiff”); defendants Amazon Studios LLC, Amazon  
3 Content Services LLC, Patrick McKay, John D. Payne, Jeff Bezos, and Jennifer  
4 Salke (the “Amazon Defendants”); and defendants The Tolkien Estate, The Tolkien  
5 Estate Limited, The Tolkien Trust, and Simon Tolkien (the “Tolkien Defendants”)  
6 (collectively, the “Parties”) with reference to the following facts:

7 1. Plaintiff filed this action on April 14, 2023.

8 2. On May 4, 2023, the Amazon Defendants and Tolkien Defendants  
9 waived service, making their responses to the initial complaint due on or before July  
10 3, 2023. The Parties agree and stipulate that the Amazon Defendants and Tolkien  
11 Defendants shall have until July 24, 2023 to respond to the initial complaint.

12 3. Plaintiff’s counsel has represented that Plaintiff will file an amended  
13 complaint on or before July 7, 2023, to which the Amazon Defendants and Tolkien  
14 Defendants consent. Once the amended complaint is filed, the Amazon Defendants  
15 and Tolkien Defendants will have fourteen days to respond to the amended  
16 complaint, pursuant to Rule 15(a) of the Federal Rules of Civil Procedure.

17 4. The Parties have not previously requested an extension of time in this  
18 matter.

19 Now, therefore, it is STIPULATED AND AGREED that the Amazon  
20 Defendants and Tolkien Defendants shall have until July 24, 2023 to respond to the  
21 initial complaint.

22 DATED: June 29, 2023

23 KATIE CHARLESTON LAW, PC  
KATIE M. CHARLESTON

24 By: /s/ Katie M. Charleston  
25 Katie M. Charleston

26 Attorney for Plaintiff  
27 DEMETRIOS POLYCHRON

1 DATED: June 29, 2023

DAVIS WRIGHT TREMAINE LLP  
NICOLAS A. JAMPOL  
AMANDA LEVINE  
SAMUEL A. TURNER

2 By: /s/ Nicolas A. Jampol  
3 Nicolas A. Jampol

4  
5 Attorneys for  
6 AMAZON DEFENDANTS

7 DATED: June 29, 2023

8 KLARIS LAW PLLC  
9 LACY H. KOONCE, III  
10 GILI KAREV

11 By: /s/ Lacy H. Koonce, III  
12 Lacy H. Koonce, III

13 Attorney for  
14 TOLKIEN DEFENDANTS

15 **FILER'S ATTESTATION**

16 Pursuant to Central District of California Local Rule 5-4.3(a)(2)(i), I hereby  
17 certify that the content of this document is acceptable to all parties in this matter,  
18 and I have obtained their authorization to affix their electronic signatures to this  
19 document.

20 DATED: June 29, 2023

DAVIS WRIGHT TREMAINE LLP

21 By: /s/ Nicolas A. Jampol  
22 Nicolas A. Jampol

23 Attorneys for  
24 AMAZON DEFENDANTS